

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

December 30, 2022

By ECF/Email

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Casey Andrew Crawford, 22 Cr. 602 (ER)*

Dear Judge Ramos:

I write to request permission for Casey Andrew Crawford to stay overnight in a hotel in Poughkeepsie, New York with his brother, Sean Wareham, from January 8, 2023 to January 15, 2023. During that week, Mr. Crawford and Mr. Wareham will be working on a job assignment in Poughkeepsie for Mr. Wareham's construction business, Sean Home Improvements. Due to the distance, Mr. Crawford would like to stay in a hotel with Mr. Wareham in Poughkeepsie rather than commute to and from the job site each day, which is approximately an hour and a half drive each way. If Mr. Crawford is forced to make this commute, he would be returning home significantly later than usual each evening. Mr. Crawford informed Pretrial Services in advance of this job assignment and the location of the job assignment, which is in the Southern District of New York.

Mr. Crawford was arrested on May 10, 2022. On May 11, 2022, bail conditions were set and Mr. Crawford was released on a \$50,000 personal recognizance bond signed by one financially responsible co-signer, his brother Mr. Wareham. At all times, Mr. Crawford has been fully compliant with his conditions of release, which, among other things, limit his travel to the Southern and Eastern Districts of New York and require Mr. Crawford to advise Pretrial Services in advance of any job assignments and the location of the job assignment. On September 1, 2022, Magistrate Judge Jennifer Willis removed Mr. Crawford from home detention and placed him on a curfew, with the curfew enforced by location monitoring and the hours set at the discretion of Pretrial Services.

Pretrial Services opposes this request, noting that they generally object to overnight travel for defendants on location monitoring. The Government "defer[s] to

Pretrial” Services. To the extent Pretrial Services have any concerns, they can do a virtual or actual home visit in advance. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Brianna Gallo

Brianna Gallo

Assistant Federal Defender

212.417.8700

brianna_gallo@fd.org

cc: Kyle Wirshba, Assistant U.S. Attorney
Jonathan Lettieri, Pretrial Services

The application for permission for Casey Andrew Crawford to stay overnight in a hotel in Poughkeepsie, New York with his brother, Sean Wareham, from January 8, 2023 to January 15, 2023 is hereby granted.

SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 1/3/2023

New York, New York